

# Exhibit B

ROUGH - JASON LOCKE

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1 R O U G H D R A F T

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4 CASE: Henry v Brown

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6 DATE: 12/11/23

7

8 WITNESS: Jason Locke

9

10 - - -

11 D R A F T

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14 This Draft Transcript is an  
15 unedited, unproofread, uncertified  
16 translation of the proceedings.

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18 Because it is unedited, this  
19 transcript may contain writing conflicts,  
20 misstrokes and untranslated words or  
21 phrases, which are remedied by the court  
22 reporter in editing.

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ROUGH - JASON LOCKE

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THE VIDEOGRAPHER: We are on

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the record on December 11, 2023,

4

at approximately 9:01 a.m. Eastern

5

Time for the remote video

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deposition of Mr. Jason Locke, in

7

the matter of Henry, et al.,

8

versus Brown University, et al.

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My name is Bryan Beltran,

10

and I'm the videographer on behalf

11

of Lexitas.

12

All present will be noted on

13

the stenographic record.

14

Will the court reporter

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please swear in the witness.

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... JASON LOCKE, having been

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first duly sworn, was examined and

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testified as follows:

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EXAMINATION

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- - -

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BY MR. DELICH:

ROUGH - JASON LOCKE

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[illegible]

22 Q. I believe you said the  
23 director of financial aid reported to

ROUGH - JASON LOCKE

23

1 Q. Okay. And who was that?

2 A. Oh, gosh. I can see his  
3 face, but I don't remember his name.

4 Q. Does Cornell have an Office  
5 of Development or alumni relations?

6 A. Yes.

7 Q. Does it have any input in  
8 the admissions process?

9 A. No.

10 Q. Would you regularly speak  
11 with anyone from the development office  
12 regarding admissions?

13 A. I would speak with the  
14 alumni admission liaison or the alumni --  
15 yeah, I think it was called the alumni  
16 admission liaison.

17 Q. And who was that?

18 A. That was Heather Nichols.

19 Q. And what was -- so you said  
20 her title is alumni admissions liaison?

21 A. I think -- that's how I  
22 referred to her. I don't know what her  
23 specific title was.

↑

ROUGH - JASON LOCKE

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[REDACTED]

14                   As I would also tell  
15   students and families, you know,  
16   regardless of your familial or your  
17   family connection to the university, all  
18   of our decisions were based on whether or  
19   not a student was admissible and a good  
20   match with the institution.

[REDACTED]